



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

MAR 7 2001

Ms. Mimi Drew  
Director  
Division of Water Resource Management  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

# of pages = 1

To: <i>Richard Harvey</i>	From: <i>Drew Bartlett</i>
Dept./Agency	Phone #
Fax: <i>(561) 615-6959</i>	Fax #
NSN 7540-01-317-7368	5000-101 GENERAL SERVICES ADMINISTRATION

Dear Ms. Drew:

The Environmental Protection Agency (EPA), Region 4, has reviewed Florida Statute Section 120.542 concerning variances and waivers as it relates to the regulation of aquifer storage and recovery (ASR) wells under the Florida Department of Environmental Protection's (FDEP) underground injection control program. EPA has determined that FDEP may grant variances to its regulations for aquifer storage and recovery wells to allow these wells to inject fluids that may contain levels of total coliform that exceed primary drinking water standards, provided that such injection may not cause a public water system to violate any regulations promulgated in 40 CFR Section 141 or otherwise adversely affect the health of persons. Criteria for the variances must include a required demonstration of total coliform die-off within the spatial and temporal limits of the variance, as well as safeguards (such as monitoring and testing) with a requirement for modification or cessation of injection activity so as to not cause a public water system to violate any regulations promulgated in 40 CFR Section 141 or otherwise adversely affect the health of persons.

EPA is pleased to assist you in developing an effective approach towards the testing of the "raw" water ASR concept. Please do not hesitate to contact me or any of my staff if you have any questions.

Sincerely,

*Beverly H. Banister*  
Beverly H. Banister, Director  
Water Management Division